

BINGHAM McCUTCHEN LLP

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Counsel to Harbinger Capital Partners Special Situations
Fund L.P., Harbinger Capital Partners Master Fund I, Ltd.

(f/k/a Harbert Distressed Investment Master Fund Ltd.),

UBS Financial Services Inc., UBS International Inc.,

UBS Financial Services Incorporated of Puerto Rico,

Deutsche Bank Securities Inc., Metropolitan Life

Insurance Company, Currenex, Inc. and

State Street Bank and Trust Company

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.

) Chapter 11

) Case No. 08-13555 (JMP)

) (Jointly Administered)

**SECOND AMENDED VERIFIED STATEMENT OF
BINGHAM McCUTCHEN LLP PURSUANT TO
FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, Bingham
McCutchen LLP (“Bingham”) makes the following disclosure in connection with the chapter 11
cases (the “Cases”) of the above-captioned debtors (collectively, the “Debtors”):

1. Bingham represents and has appeared in the Cases on behalf of the entities listed on Exhibit A hereto (the “Entities”), which may hold claims against and/or interests in the Debtors arising out of applicable agreements, law, or equity pursuant to their respective relationships with the Debtors:

2. Bingham represented each of the Entities prior to the Debtors’ Cases. Each of the Entities separately requested that Bingham represent them in connection with the Cases.

3. Upon information and belief, Bingham does not currently possess and has not possessed in the past any claims against or interests in any Debtor.

Dated: New York, New York
October 14, 2008

BINGHAM McCUTCHEN LLP

By: /s/ Sabin Willett
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Exhibit A

Harbinger Capital Partners Special Situations Fund L.P.
555 Madison Avenue, 16th Floor
New York, NY 10022

Nature of Claim: Amounts owing under the ISDA Master Agreement dated July 28, 2006 with Lehman Brothers Special Financing Inc. (as amended, modified or supplemented from time to time and together with all schedules).

Claim Amount: Not less than \$2,242,881.¹

Nature of Claim: Amounts owing under the related Guarantee of Lehman Brothers Holdings Inc. (as amended, modified or supplemented from time to time and together with all schedules).

Claim Amount: Not less than \$2,242,881.¹

Harbinger Capital Partners Master Fund I, Ltd. (f/k/a Harbert Distressed Investment Master Fund Ltd.)

555 Madison Avenue, 16th Floor
New York, NY 10022

Nature of Claim: Amounts owing under ISDA Master Agreement dated May 20, 2005 (as amended, modified or supplemented from time to time and together with all schedules).

Claim Amount: Not less than \$266,808,436.¹

Nature of Claim: Amounts owing under the related Guarantee of Lehman Brothers Holdings Inc. (as amended, modified or supplemented from time to time and together with all schedules)..

Claim Amount: Not less than \$266,808,436.¹

UBS Financial Services Inc.
1285 Avenue of the Americas
New York, NY 10019

Nature of Claim: Upon information and belief, UBS Financial Services Inc. is a counterparty to certain agreements with one or more of the Debtors.

Claim Amount: UBS Financial Services Inc. is in the process of calculating its claim amount.¹

UBS International Inc.
1285 Avenue of the Americas
New York, NY 10019

Nature of Claim: Upon information and belief, UBS International Inc. is a counterparty to certain agreements with one or more of the Debtors.

Claim Amount: UBS International Inc. is in the process of calculating its claim amount.¹

¹ The Entity reserves all rights to amend, restate and/or supplement the claim set forth herein from time to time as such becomes further liquidated or for any reason the Entity deems appropriate, and to assert any and all other claims of whatever kind or nature that the Entity holds, or may hold, against the Debtors, including, without limitation, (i) to claim all amounts due in respect of any additional prepetition or postpetition (a) professional fees or expenses, (b) interest, or (c) other fees or charges, (ii) to reflect additional claims under operative documents to the extent discovered after the filing hereof, or (iii) for any other reason, should the Entity deem it appropriate. The filing of this statement by Bingham shall not be deemed a waiver of any such claims.

UBS Financial Services Incorporated of Puerto Rico
1285 Avenue of the Americas
New York, NY 10019

Nature of Claim: Upon information and belief, UBS Financial Services Incorporated of Puerto Rico is a counterparty to certain agreements with one or more of the Debtors.

Claim Amount: UBS Financial Services Incorporated of Puerto Rico is in the process of calculating its claim amount.¹

Deutsche Bank Securities Inc.
60 Wall Street
New York, New York 10005

Nature of Claim: Upon information and belief, Deutsche Bank Securities Inc. is a counterparty to certain agreements with one or more of the Debtors.

Claim Amount: Deutsche Bank Securities Inc. is in the process of calculating its claim amount.¹

Metropolitan Life Insurance Company
10 Park Avenue
PO Box 1902
Morristown, NJ 07962-1902

Nature of Claim: Amounts owing on public bonds and Lehman Brothers Holdings Inc. guarantees of otherwise collateralized transactions with non-debtor entities.

Claim Amount: Not less than \$1.1 billion.¹

Currenex, Inc.
1230 Avenue of the Americas, 18th Floor
New York, NY 10020

It is unclear at this time whether Currenex holds claims against the Debtors.¹ Currenex holds claims against Lehman Brothers Inc. (which entity is subject of a SIPA proceeding) and/or Barclays under an Agreement for Currenex Services dated July 5, 2001 (as amended) in the amount of \$247,512.68.¹

State Street Bank and Trust Company
One Lincoln Street
Boston, MA 02111

Nature of Claim: Amounts owing to State Street Bank and Trust Company under Master Repurchase Agreement dated as of May 1, 2007 between Lehman Commercial Paper Inc. as Seller and State Street Bank and Trust Company as Buyer.

Claim Amount: Claims in the face amount of \$1,000,000,000, which may in the future be mitigated in part by recovery on purchased assets of undetermined value.¹

Nature of Claim: Amounts owing to State Street Bank and Trust Company under Guarantee of Lehman Brothers Holdings Inc. in favor of State Street Bank and Trust Company dated May 1, 2007, guarantying obligations of Lehman Commercial Paper Inc. under Master Repurchase Agreement.

Claim Amount: Claims in the face amount of \$1,000,000,000, which may in the future be mitigated in part by recovery on purchased assets of undetermined value.¹

State Street Bank and Trust Company holds claims against Lehman Brothers Inc. (which entity is

subject of a SIPA proceeding) and/or Barclays under that certain State Street Global Link/Multi-Bank Agreement dated April 11, 2002 (as may be amended) in the amount of \$ 95,765.50 .¹